CAA112(r) INSPECTION REPORT

Name: Simply Essentials Poultry	
Address: 901 North Main Street, Charles City, IA 50616	**Date of Inspection**: July 10, 2018
County: Floyd	**Case No**: 18IA0710
Phone: 641-228-4127	**RMP No**: 1000 0021 6214
High Risk: No	**FRS No**: 1100 4427 8689
CAA Title V: No	**Program Level**: Program 3
Mailing Address: 12980 Foster St., Overland Park, KS 66213	
Process: Anhydrous ammonia used for refrigeration	

SUMMARY OF OBSERVATIONS

A review of the Simply Essentials Poultry (Simply Essentials) documents and facility revealed the following deficiencies regarding Chemical Accident Prevention Provisions (Title 40 *Code of Federal Regulations* [CFR] Part 68):

1. **The facility had not retained all Process Hazard Analyses (PHA) for the life of the system, as required by 40 CFR 68.67(g).**

2. **The facility had not assured that PHA recommendations had been resolved in a timely manner, as required by 40 CFR 68.67(e).** *This preliminary finding was identified based on post-inspection findings.*

3. **A safety shower is not installed outside of the machinery room, as required by 40 CFR 68.65(d)(2) and 68.73(d)(3).**

4. **The facility had not implemented written MOC procedures to manage changes related to the 2016 upgrade of the anhydrous ammonia refrigeration system, as required by 40 CFR 68.75(a).** *This preliminary finding was identified based on post-inspection findings.*

5. **The facility could not provide documentation showing that a Pre-Startup Safety Review (PSSR) had been completed prior to introducing anhydrous ammonia into the upgraded refrigeration system in late 2016, as required by 40 CFR 68.77(a-b).**

6. **The facility failed to update its Risk Management Plan (RMP) within 1 month following the change of the emergency contact number, as required by 40 CFR 68.195(b).**

7. **The facility had not submitted an updated RMP to the U.S. Environmental Protection Agency (EPA) at least once every 5 years, as required by 40 CFR 68.190(b)(1).** *This preliminary finding was identified based on post-inspection findings.*

INTRODUCTION

I, Robert Monnig, Tetra Tech, Inc. (Tetra Tech), as a representative of the U.S. Environmental Protection Agency (EPA), Region 7, inspected the Simply Essentials facility in Charles City, Iowa, on July 10, 2018.

On July 6, 2018, I attempted to contact the Simply Essentials facility by phone to announce the upcoming inspection. I tried calling the phone number listed in the facility's current RMP (see Attachment 11); this phone number (641-220-7628) was listed as both the "Emergency Contact Phone" and the "Emergency Contact 24-Hour Phone Number"; however, I received a "no longer in service" message (no forwarding number was provided in the message) upon calling the phone number. I was able to find another phone number online and I ultimately reached Mr. Donnie Peters by phone and email to arrange for the inspection. I asked that employees be notified of the inspection and informed him that they are allowed to participate. I informed Mr. Peters that EPA had selected Simply Essentials for inspection based on a report of a phone call to the National Response Center (NRC) on October 26, 2016, indicating a release of anhydrous ammonia had occurred at the facility and that two people had been injured and hospitalized.

I conducted the inspection to determine if the facility complies with Section 112(r) of the Clean Air Act (CAA), as amended in 1990. EPA's regulations describing how this law is to be implemented are in 40 CFR 68 (CAA). The law and implementing regulations 40 CFR 68, Chemical Accident Prevention Program (CAPP), require facilities to (1) submit to EPA a complete RMP for those regulated chemicals the facility has processed in amounts above applicable threshold quantities after June 21, 1999; and (2) implement the program described in the RMP.

All attachments cited in this inspection report (Attachments 1 through 13) are also in a folder on the accompanying CD. Folder numbers on the CD correspond to attachment numbers. As an example, Attachment #2 is in Folder #2. Attachments may not contain all documents or parts of documents collected at the time of the inspection; however, the accompanying folder on the CD will have the complete document(s). The CD itself is Attachment 13, and contains a copy of this inspection report, the original documents obtained, photographs taken during the inspection, the RMP current at the time of the inspection, emails between the facility and the compliance inspector, checklists, and completed forms.

HISTORY OF BUSINESS

The Simply Essentials facility in Charles City, Iowa is a poultry processing facility with an anhydrous ammonia refrigeration system that cools the interior of the facility. The anhydrous ammonia refrigeration system is a single system with an anhydrous ammonia charge of approximately 22,000 pounds. Mr. Peters told me that Simply Essentials had bought the facility in April 2016 from Cedar River Poultry. Although Mr. Peters did not work at the facility during

Cedar River Poultry's ownership (Mr. Peters told me he had begun working at the facility in April 2016), he conveyed his understanding that after purchasing the facility, Cedar River Poultry had operated the facility as a poultry processing facility for only a few days before shuttering the facility due to production issues. Mr. Peters and Mr. Sweet told me that at the time Simply Essentials purchased the facility in April 2016, the anhydrous ammonia refrigeration system had been shut down with the anhydrous ammonia charge left in the system. Mr. Sweet told me that after purchasing the facility, Simply Essentials removed the anhydrous ammonia charge from the refrigeration system and placed it into a semi-trailer tank that was staged at the facility so that the refrigeration system could be upgraded. Mr. Sweet told me that Simply Essentials hired National Engineers to upgrade the refrigeration system, and that upgrades included installing new compressors, new vessels (such as the medium temperature recirculators), and new evaporators; and replacing piping, insulation, and labeling. Mr. Peters and Mr. Sweet told me that upon completion of the upgrades, the anhydrous ammonia charge had been transferred from the semi-trailer tank back into the refrigeration system. Mr. Peters and Mr. Sweet were unsure of the exact date when anhydrous ammonia had been transferred back into the refrigeration system, but told me that this had occurred in the last quarter of 2016 and possibly in October 2016. Mr. Peters told me that the facility had begun processing birds in December 2016. I asked Mr. Peters and Mr. Sweet if any anhydrous ammonia, in addition to the charge that had been removed from the system during the upgrades and held in the semi-trailer tank, had been added to the system. Mr. Peters and Mr. Sweet told me that they could not remember any addition of anhydrous ammonia to the system.

Mr. Peters told me that Pitman Family Farms had purchased the facility in November 2017, but that the facility still operates under the name Simply Essentials.

The following summarizes reported/observed amounts of anhydrous ammonia at Simply Essentials:

	Quantity – pounds
Maximum Intended Inventory	22,000
Actual Quantity at the Time of Inspection	22,000 (per facility's engineering calculation)
Tier II Maximum Daily Amount	34,000
Quantity Listed on RMP	25,000

PERSONS INTERVIEWED AND INDIVIDUAL RESPONSIBILITIES

I interviewed the following persons as part of the inspection process:

Donnie Peters ..... Complex Manager, Simply Essentials
Jason Sweet ..... Operator, Simply Essentials
Mitch Liddle ..... Operators, Simply Essentials
Nate Torres ..... Operations Manager, Resource Compliance
Grant Verhoeven ..... Process Safety Consultant, Resource Compliance
Lezlie Weber ..... Emergency Management Director, Floyd County

OPENING CONFERENCE

I arrived at the Simply Essentials facility in Charles City, Iowa, on Tuesday, July 10, 2018, at approximately 8:00 a.m., and entered the plant office where I met Mr. Peters, Complex Manager for Simply Essentials; Mr. Jason Sweet and Mr. Mitch Liddle, refrigeration system operators for Simply Essentials; and Mr. Nate Torres and Mr. Grant Verhoeven, consultants with Resource Compliance who assist Simply Essentials with RMP implementation. We sat down in a conference room and I explained that I was conducting the inspection under authority of the CAA's Chemical Accident Prevention Provisions. I explained that I would need to conduct a walk-through of the covered process, taking photographs. I also stated that after completing the walk-through and reviewing all applicable documents, I would conduct an exit interview to explain my findings, provide a receipt for any requested document copies, and answer questions. I showed Mr. Peters my letter of authorization from EPA Region 7. I then filled out a Notice of Inspection Form (see Attachment 1), and I explained that my inspection was for enforcement purposes and that enforcement actions could result from the inspection. Mr. Peters signed the Notice of Inspection form. At that point, I began filling out the Region 7 multi-media screening checklist (see Attachment 1), directing questions to Mr. Peters.

After the introduction and completion of the multi-media screening checklist, I asked to see the facility RMP documentation, including the off-site consequence analysis, process safety information, process hazard analyses, operating procedures, training records, maintenance records, compliance audits, and emergency response procedures. As I reviewed available documents, I directed any questions I had to Simply Essentials staff and Mr. Torres and Mr. Verhoeven, and I noted my findings on the Region 7 Checklist for Risk Management Plan Investigations or Audits at Program 3 Stationary Sources, and on the Region 7 Checklist for Ammonia Refrigeration Facilities (see Attachment 1).

HAZARD ASSESSMENT

I reviewed the facility's hazard assessment and off-site consequence analysis (OCA) documentation and found that the facility had prepared worst-case and alternative release scenarios (Attachment 2). The worst-case scenario involved emptying of 11,114 pounds of anhydrous ammonia from the high-pressure receiver (the largest vessel of the refrigeration system). The OCA documentation indicates a distance to endpoint (DTE) of 1.2 miles based on analysis by use of RMP*Comp. The facility reported that this worst-case scenario would affect a population of 6,225 persons. The OCA was last updated by the facility in April 2018.

The facility's Emergency Planning and Community Right-to-Know Act (EPCRA) Tier II report for the 2017 reporting period (see Attachment 3) lists a maximum daily amount of anhydrous ammonia of 34,000 pounds.

PROCESS SAFETY INFORMATION (PSI)

I examined the facility's PSI and obtained a copy of the facility's Safety Data Sheet (SDS) for anhydrous ammonia and a block flow diagram of the process (see Attachment 4). I asked to review the facility's maximum intended inventory for anhydrous ammonia and was provided an inventory summary (see Attachment 4) that listed an anhydrous ammonia inventory of

21,536 pounds. I also obtained documentation related to design codes and standards employed, ventilation system design, and safety system information (see Folder 4 on the CD). Regarding the design standards and codes, Mr. Torres told me that the facility generally refers to International Institute of Ammonia Refrigeration (IIAR) guidelines.

I observed that some safe upper and lower limits had been referenced in equipment specification profiles maintained for various equipment; I obtained a copy of the equipment specification profile for the high-pressure receiver (see Folder 4 on the CD).

Process Hazard Analyses (PHA)

The facility showed me, and I obtained a copy of, a PHA dated October 28-29, 2016 (see Folder 5 on the CD). The PHA applied a "what if" methodology. I noted the PHA addressed hazards of the process, engineering and administrative controls, consequences of failure, source siting, and human factors. The PHA provided a qualitative evaluation of the range of possible safety and health effects that would result from failure of controls. I asked how the facility tracks and documents resolutions to PHA findings. Mr. Torres told me that the facility tracks PHA recommendations using the management software system call PSM Writer. Mr. Torres queried PSM Writer and generated a report of both closed and opened PHA recommendations (see Attachment 5).

Noting that the anhydrous ammonia refrigeration system and anhydrous ammonia charge had been in place prior to 2016, I asked if previous PHA reports were available. Mr. Peters told me that no previous PHA reports were available because the previous facility owners had not provided them to Simply Essentials. Based on this information, I identified the following preliminary finding:

1. **The facility had not retained all Process Hazard Analyses (PHA) for the life of the system, as required by 40 CFR 68.67(g).**

Following the inspection, I reviewed the open PHA recommendations report the facility had provided (see Attachment 5) and noted that 10 recommendations had not been resolved. The facility listed a due date of January 30, 2017 for 9 of the recommendations and a due date of April 30, 2017 for one recommendation. Based on this information, I identified the follow preliminary finding:

2. **The facility had not assured that PHA recommendations had been resolved in a timely manner, as required by 40 CFR 68.67(e).**

STANDARD OPERATING PROCEDURES (SOP)

I asked to review the facility's operating procedures for the covered process. Mr. Torres showed me that SOPs were stored on the facility's electronic PSM Writer system, accessible to employees who operate and maintain the refrigeration system. I noted that the SOPs addressed various operating phases, including initial startup, normal operations, temporary operations, emergency shutdown, emergency operations, normal shutdown, and startup following a shutdown. I also noted that the SOPs referenced operating limits, safety and health

considerations, and safety systems. I asked if SOPs address the draining of oil from oil pots. Mr. Torres accessed a SOP for a low temperature recirculator and showed me that the SOP addressed draining oil from the recirculator's oil pot. I obtained a copy of this SOP and also a copy of a SOP for a medium temperature compressor (see Attachment 6). I asked if the facility had safe work practices addressing lockout/tagout, confined space entry, and line break. Mr. Sweet and Mr. Liddle were able to show me such procedures.

TRAINING

I asked how the facility trains employees to operate the covered process. Mr. Peters and Mr. Torres told me that operators of the refrigeration system attend courses at the Garden City Ammonia Program (GCAP) in Garden City, Kansas. Mr. Torres showed me "Operator I" GCAP certificates for the three operators of the facility. In addition, Mr. Sweet and Mr. Liddle told me that operators receive on-the-job training and that the trainee must demonstrate competency before the trainer signs off. Mr. Torres show me an electronic system for tracking on-the-job training.

MECHANICAL INTEGRITY

I asked about the facility's mechanical integrity program. Mr. Torres told me that the facility references IIAR Bulletin No. 109 ("B109") when conducting maintenance and inspections of the equipment, and Mr. Torres showed me B109 inspection checklists that had been completed during inspections of equipment in 2017 and 2018. I obtained a copy of the B109 form documenting the inspection of compressor 1C (see Attachment 7). Mr. Torres told me that the facility is in the process of moving mechanical integrity procedures onto the PSM Writer system. I asked how the frequency of inspections and testing is determined, and I was told that the facility references manufacturer recommendations and IIAR guidelines when determining frequencies.

During the walk-through of the covered process, I observed that a safety shower and eyewash station were installed inside the engine room, but that no safety shower was installed outside of the engine room (I did observe eyewash bottles within a storage shed outside of the engine room). I noted that lack of a safety shower outside of the engine room contrasts with the recognized and generally accepted engineering practice (RAGAGEP) of installing and maintaining a safety shower outside of the engine room (see eyewash and safety shower requirements of IIAR 2-2014, 6.7.1, 6.7.2, and 6.7.3 and IIAR 2-2008A, 13.1.6). Based on this observation, I identified the following preliminary finding:

3. **A safety shower is not installed outside of the machinery room, as required by 40 CFR 68.65(d)(2) and 68.73(d)(3).**

MANAGEMENT OF CHANGE (MOC)

Mr. Torres showed me the facility's electronic system for implementing management of change (MOC) procedures, which is integrated within the PSM Writer system. Mr. Torres showed me a completed MOC form titled "New Facility Ownership and RMP/PSM Program Update" with a request date of April 11, 2018. This MOC addressed changes related to acquisition of the facility

by Pitman Farms. I obtained a copy of the completed MOC (see Attachment 8). Mr. Torres told me that this was the only MOC form that had been completed since Simply Essentials began operating in late 2016. I reviewed the completed MOC and it appeared to address the required elements.

Following the inspection, I further considered the Program 3 MOC requirements (40 CFR 68.75) with respect to the changes that had occurred to the refrigeration system in 2016, which Mr. Sweet told me had included installing new compressors, new vessels (such as the medium temperature recirculators), and new evaporators; and replacing piping, insulation, and labeling. I considered that some of these changes to the covered process were not "replacements in kind," and therefore, the facility was required to follow MOC procedures. Because there was no documentation that the facility had not implemented MOC procedures with respect to the 2016 upgrade (the facility could only show me one completed MOC form with the request date of April 11, 2018), I identified the following preliminary finding.

4. **The facility had not implemented written MOC procedures to manage changes related to the 2016 upgrade of the anhydrous ammonia refrigeration system, as required by 40 CFR 68.75(a).**

PRE-STARTUP SAFETY REVIEW (PSSR)

I asked about the facility's PSSR procedures and asked if any PSSRs had been conducted since the facility began operating in 2016. Mr. Torres provided me a copy of a completed PSSR form that had two signatures, one of which was undated and the other of which was dated July 25, 2017 (see Attachment 9). Noting that the only date indicated on the completed PSSR form (July 25, 2017) was at least 7 months beyond the date when the anhydrous ammonia refrigeration system had begun operation in late 2016, I asked if the facility had any documentation of the facility conducting a PSSR prior to re-introduction of anhydrous ammonia into the system following the upgrades in late 2016. Mr. Torres and Mr. Peters told me that the PSSR form with the July 25, 2017 date was the only PSSR documentation the facility had. Based on this information, I identified the following preliminary finding:

5. **The facility could not provide documentation showing that a PSSR had been completed prior to introducing anhydrous ammonia into the upgraded refrigeration system in late 2016, as required by 40 CFR 68.77(a-b).**

Mr. Torres told me that the facility's current PSSR procedure and forms had been enacted around April 2018, based on IIAR Standard 5-2013 (Start-up and Commissioning of Closed-Circuit Ammonia Refrigeration Systems). Mr. Torres provided me a copy of the facility's current PSSR form (see Attachment 9).

COMPLIANCE AUDIT

I asked to see the facility's two most recent compliance audit reports regarding the covered process. Mr. Torres told me that Simply Essentials did not have a completed compliance audit because Simply Essentials had been operating the anhydrous ammonia refrigeration system for less than 3 years. He told me that a compliance audit was scheduled for 2019.

INCIDENT INVESTIGATION AND OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION (OSHA) 300 LOGS

I asked Mr. Peters if any previous incidents had resulted in or posed potential for catastrophic releases of anhydrous ammonia. Mr. Peters said that no such incidents had occurred. Mr. Torres showed me the facility's system for documenting incidents, and showed me records of two near-miss type incidents that had occurred in 2018. Mr. Torres told me that the two incidents had not resulted in or posed potential for catastrophic releases. I obtained a copy of one of the incident reports (see Attachment 10). During the inspection, I reviewed the facility's OSHA 300 logs from years 2016 through 2018 and found no documented incidents related to anhydrous ammonia.

I asked Mr. Peters about the incident that had prompted the call to the NRC on October 26, 2016. Mr. Peters and Mr. Sweet told me that at the time of the incident, an employee of the contractor, R.A. Lewis, was cutting into a pipe believed to have been isolated from the rest of the system. However, cutting into the pipe triggered a release of anhydrous ammonia vapor from an approximately 20-foot section of piping. Mr. Sweet told me that at the time of the incident, he had believed most of the anhydrous ammonia charge was still held in the semi-trailer tank. Mr. Sweet told me that following the incident, engineers estimated that 0.25 pound of anhydrous ammonia had been released to the atmosphere. Mr. Peters and Mr. Sweet told me that they were unaware of anyone being injured or hospitalized due to the release.

Prior to the inspection, on July 9, 2018, I had called the Floyd County Emergency Management office to inquire about Simply Essentials coordination with local emergency responders, and had spoken with Ms. Lezlie Weber, Emergency Management Director. Ms. Weber told me that Simply Essentials submits its EPCRA Tier II reports annually, and that the office had not had any problems with Simply Essentials' level of coordination. I also asked Ms. Weber if she was aware of an anhydrous ammonia release at Simply Essentials on October 26, 2016. Ms. Weber checked with Floyd County 911 dispatch, and in a follow-up email (see Attachment 10), identified a call for service to the Simply Essentials facility for an anhydrous ammonia leak at 10:33 a.m., October 26, 2016. Ms. Weber indicated that the duration of the response was about 10 to 15 minutes, and that no reports through dispatch indicated anyone hurt. She added that no ambulance had been dispatched to the facility.

EMPLOYEE PARTICIPATION

I asked if the facility had a written plan to implement employee participation in PHA and other applicable elements. Mr. Torres showed me a written procedure that addressed employee participation in PHA and monthly meetings. He also showed me a written policy regarding employee participation.

HOT WORK PERMIT

Mr. Sweet showed me a copy of a hot work permit for work near the covered process. The permit appeared to address the required elements.

CONTRACTORS

I asked Mr. Peters how the facility evaluates information regarding contractor safety performance. Mr. Peters told me that Simply Essentials evaluates contractor information provided in a required information packet that addresses OSHA logs, experience modification rate (EMR), and previous experience. Mr. Peters told me that contractors working on the anhydrous ammonia refrigeration system are required go through Simply Essential's safety training before beginning work on the refrigeration system.

EMERGENCY RESPONSE

Mr. Peters told me that the facility would rely on local emergency responders to respond to accidental releases of anhydrous ammonia.

During my phone call with Ms. Lezlie Weber, Emergency Management Director, on July 9, 2018, Ms. Weber told me that Simply Essentials submits its EPCRA Tier II reports annually, and that their office had not had any problems with Simply Essentials' level of coordination.

MANAGEMENT SYSTEM

I asked Mr. Peters and Mr. Torres if Simply Essentials had developed a management system to oversee implementation of the facility's RMP program. Mr. Torres showed me a written policy that explained the facility's management system and included an organizational chart.

RISK MANAGEMENT PLAN

I reviewed the facility's current RMP submission, dated January 26, 2017, which EPA had provided me (see Attachment 11). I noted that the executive summary included the six required elements. During the inspection, I asked Mr. Peters about the emergency contact phone number listed in the RMP (641-220-7628), and I explained that I had received a "no-longer in service" message when dialing the number on July 6, 2018. Mr. Peters told me that the phone number had been changed about 1.5 or 2 months previously, and that the current emergency contact number was his mobile number (903-767-2652). Based on this information, I identified the following preliminary finding:

6. **The facility failed to update its Risk Management Plan (RMP) within 1 month following the change of the emergency contact number, as required by 40 CFR 68.195(b).**

Following the inspection, I reviewed the timeline of RMP submissions regarding upgrades to and operation of the anhydrous ammonia refrigeration system. EPA told me that an RMP submission for the facility using the facility name "Cedar River Poultry" had occurred on November 11, 2011, and that the date of the current RMP submission is January 26, 2017. Based on the information that Mr. Peters and Mr. Sweet provided during the inspection, it appears that at least a threshold amount of anhydrous ammonia was present in the refrigeration system at the time Simply Essentials purchased the facility in April 2016, and that this amount of anhydrous

ammonia has remained at the facility since that time (either contained in the refrigeration system or held on site in a semi-trailer tank during the 2016 upgrades). Because 40 CFR 68.190(b)(1) requires update of an RMP at least once every 5 years, and because a threshold amount of anhydrous ammonia apparently has been present at the facility from the time of its purchase in April 2016, the RMP was due for resubmission on November 11, 2016. An update or resubmission of the RMP was not received until January 26, 2017. Because more than 5 years had elapsed between the RMP filings of November 11, 2011, and January 26, 2017, I identified the following preliminary finding during my post-inspection review:

7. **The facility had not submitted an updated RMP to EPA at least once every 5 years, as required by 40 CFR 68.190(b)(1).**

Following the inspection, I also noted that EPA requires a facility to update its RMP upon a change in ownership (see https://emergencymanagement.zendesk.com/hc/en-us/articles/212086517-If-a-facility-changes-owners-but-the-manufacturing-operations-have-not-changed-are-they-REQUIRED-to-update-their-RMP-).

PHOTOGRAPHS

During the site walk-through, 18 digital photographs were taken; these photographs are presented in a photographic log in Attachment 12. All 18 photographs are also in Folder 12 on the CD.

CLOSING CONFERENCE

At the end of the inspection, I reviewed my observations and the preliminary findings with Mr. Peters, Mr. Sweet, Mr. Liddle, Mr. Torres, and Mr. Verhoeven. I also explained that findings could be identified via post-inspection review of the documents obtained. I provided the Confidentiality Notice and the completed Receipt for Samples and Documents form (see Attachment 1), which Mr. Peters reviewed. Mr. Peters reviewed the receipt for documents first, signed it, and completed the Confidentiality Notice. I then filled out the Notice of Preliminary Findings form (see Attachment 1) and provided it to Mr. Peters for review and signature.

I departed the facility at approximately 2:00 p.m. on July 10, 2018.

This report concludes my inspection activities regarding the Simply Essentials facility in Charles City, Iowa.

Robert Monnig

Robert Monnig
Compliance Inspector

ATTACHMENTS

1 – Inspection Forms and Checklists
2 – Hazard Assessment
3 – EPCRA Tier II
4 – Process Safety Information
5 – Process Hazard Analysis
6 – Standard Operating Procedures
7 – Mechanical Integrity
8 – Management of Change
9 – Pre-Startup Safety Review
10 – Incident Investigation
11 – Risk Management Plan
12 – Photographic Log
13 – CD – Attached to Report

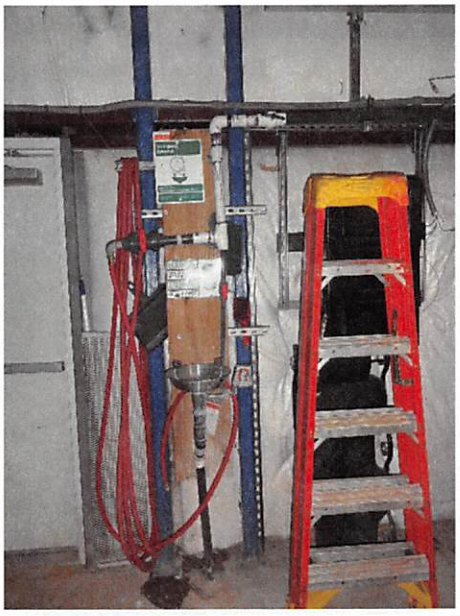
Simply Essentials Poultry
Charles City, Iowa

CASE NO. 18IA0710	DESCRIPTION	This photograph shows the entrance to the engine room of the cover process (an anhydrous ammonia refrigeration system).	1
	FACILITY	Simply Essentials Poultry	Date
Direction: *Not recorded*	PHOTOGRAPHER	Robert Monnig	7/10/2018

CASE NO. 18IA0710	DESCRIPTION	This photograph shows compressors in the engine room.	2
	FACILITY	Simply Essentials Poultry	Date
Direction: *Not recorded*	PHOTOGRAPHER	Robert Monnig	7/10/2018

Simply Essentials Poultry
Charles City, Iowa

CASE NO. 18IA0710	DESCRIPTION	This photograph shows typical piping labeling observed in the engine room.	3
	FACILITY	Simply Essentials Poultry	Date
Direction: *Not recorded*	PHOTOGRAPHER	Robert Monnig	7/10/2018



CASE NO. 18IA0710	DESCRIPTION	This photograph shows an eye wash station in the engine room.	4
	FACILITY	Simply Essentials Poultry	Date
Direction: *Not recorded*	PHOTOGRAPHER	Robert Monnig	7/10/2018

Simply Essentials Poultry
Charles City, Iowa

CASE NO. 18IA0710	DESCRIPTION	This photograph shows an emergency show inside the engine room.	5
	FACILITY	Simply Essentials Poultry	Date
Direction: *Not recorded*	PHOTOGRAPHER	Robert Monnig	7/10/2018

CASE NO. 18IA0710	DESCRIPTION	This photograph shows anhydrous ammonia sensors inside the engine room.	6
	FACILITY	Simply Essentials Poultry	Date
Direction: *Not recorded*	PHOTOGRAPHER	Robert Monnig	7/10/2018

Simply Essentials Poultry
Charles City, Iowa

CASE NO. 18IA0710	DESCRIPTION	This photograph shows an oil pot equipped with a self-closing valve. A shut-off valve is installed in series with the self-closing valve.	7
	FACILITY	Simply Essentials Poultry	Date
Direction: *Not recorded*	PHOTOGRAPHER	Robert Monnig	7/10/2018

CASE NO. 18IA0710	DESCRIPTION	This photograph shows the high-pressure receiver outside of the engine room.	8
	FACILITY	Simply Essentials Poultry	Date
Direction: *Not recorded*	PHOTOGRAPHER	Robert Monnig	7/10/2018

Simply Essentials Poultry
Charles City, Iowa

CASE NO. 18IA0710	DESCRIPTION	This photograph shows the top of the high-pressure receiver and the labeled king valve.	9
	FACILITY	Simply Essentials Poultry	Date
Direction: *Not recorded*	PHOTOGRAPHER	Robert Monnig	7/10/2018

CASE NO. 18IA0710	DESCRIPTION	This photograph shows a roof-top condenser of the covered process.	10
	FACILITY	Simply Essentials Poultry	Date
Direction: *Not recorded*	PHOTOGRAPHER	Robert Monnig	7/10/2018

Simply Essentials Poultry
Charles City, Iowa

CASE NO. 18IA0710	DESCRIPTION	This photograph shows the interior of a storage shed located near the engine room. Emergency eye wash bottles are mounted on the interior wall of the shed.	11
	FACILITY	Simply Essentials Poultry	Date
Direction: *Not recorded*	PHOTOGRAPHER	Robert Monnig	7/10/2018

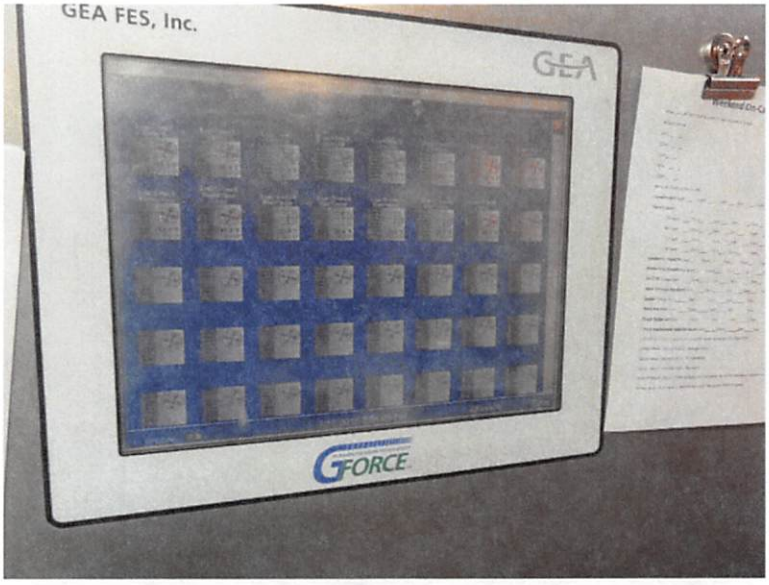
CASE NO. 18IA0710	DESCRIPTION	This photograph shows the data plate of the high-pressure receiver. The data plate indicates a build year of 1996.	12
	FACILITY	Simply Essentials Poultry	Date
Direction: *Not recorded*	PHOTOGRAPHER	Robert Monnig	7/10/2018

Simply Essentials Poultry
Charles City, Iowa

CASE NO. 18IA0710	DESCRIPTION	This photograph shows dual relief valves installed on the high-pressure receiver.	13
	FACILITY	Simply Essentials Poultry	Date
Direction: *Not recorded*	PHOTOGRAPHER	Robert Monnig	7/10/2018

CASE NO. 18IA0710	DESCRIPTION	This photograph shows an ammonia pipe marker identification chart posted inside the engine room.	14
	FACILITY	Simply Essentials Poultry	Date
Direction: *Not recorded*	PHOTOGRAPHER	Robert Monnig	7/10/2018

Simply Essentials Poultry
Charles City, Iowa



CASE NO. 18IA0710	DESCRIPTION	This photograph shows the human-machine interface touchscreen of the refrigeration control system.	15
	FACILITY	Simply Essentials Poultry	Date
Direction: *Not recorded*	PHOTOGRAPHER	Robert Monnig	7/10/2018